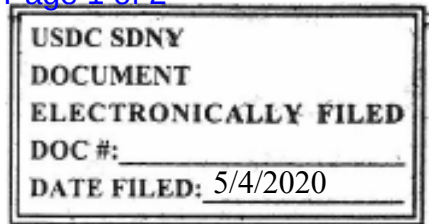


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VIA ECF

May 4, 2020

The Honorable Alison J. Nathan
United States District Court
40 Foley Square
Southern District of New York
New York, NY 10007-1312

Re: United States v. Tyrone Woolaston, 1:18-cr-00212-AJN

Dear Judge Nathan:

We represent defendant Tyrone Woolaston in the above-referenced matter and respectfully request an adjournment of sentencing, currently scheduled for June 12, 2020, in this case for approximately two months. The Government consents to this request.

I make this request so that I can have additional time to confer with my client and to prepare for sentencing. The primary reason for this request is actual and anticipated delays with the sentencing preparation due to the COVID-19 outbreak. Because of the outbreak, we are unable to visit with our client and instead must schedule prearranged calls with him. There have been logistical and scheduling delays with this process, including ones in which our client was not produced at the designated time for a call. Looking forward, I also anticipate some delays associated with our gathering letters of support for our client because of the outbreak and the challenges in communicating with third parties in the current climate. And finally, I have several other active matters in the expedited discovery and briefing phases that have occupied much of my time over the last two months.

This is the second request for an adjournment of sentencing. I made the initial on February 5, 2020 because of my trial schedule and the sentencing date was adjourned from April 5 until June 12. At the time, I did not anticipate the delays we have encountered associated with the COVID-19 outbreak which I summarized above. I communicated with the Government on Friday, May 1 and they consent to this request.

May 4, 2020


I thank the Court for its consideration of this request.

Sincerely,

/s/Christopher LaVigne

CC (Via ECF): Alison Moe, Assistant United States Attorney
Thane Rehn, Assistant United States Attorney

The sentencing for Defendant Tyrone Woolaston currently scheduled for June 12, 2020 is hereby adjourned to August 14, 2020 at 1:00 p.m. Sentencing submissions from the Defendant are due on or before August 7, 2020. The Government's submission is due on or before August 12, 2020. So the Court can ensure defense counsel is able to speak with the Defendant, the Court should be informed immediately if any further efforts to communicate with the Defendant are not accommodated.
SO ORDERED.

SO ORDERED. 5/4/20

Alison J. Nathan, U.S.D.J.